

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

NOTICE OF MOTION

– against –

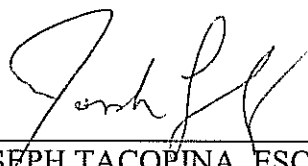
Civil Action No.: 11-CIV-8731

MICHAEL R. BALBOA and GILLES
T. DE CHARSONVILLE,

Defendants.
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PLEASE TAKE NOTICE that, upon the pleadings in this action, all prior proceedings held herein and the accompanying Affidavit of Joseph Tacopina and Memorandum of Law, defendant Michael Balboa (“Defendant”), by and through his attorneys, hereby moves this Court at a motion term to be held before the Honorable Paul A. Crotty, United States District Judge, 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, staying this civil Securities and Exchange Commission action pending the resolution of the criminal proceeding against the Defendant, as well as for such other and further relief as this Court may deem just and proper.

Dated: February 22, 2012
New York, New York



JOSEPH TACOPINA, ESQ.
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TO:

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

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Securities and Exchange Commission
New York Regional Office
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